

## **REMARKS/ARGUMENTS**

### **1.) Claim Amendments**

Claims 1-24 are pending in the application. The Applicants have amended claims 1-4, 6-12, 14-20, and 22-24. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

### **2.) Claim Rejections – 35 U.S.C. § 102(b)**

The Examiner rejected claims 1-3, 7-11, 15, 16-17, 19-20, and 23 under 35 U.S.C. § 102(b) as being anticipated by Johnson et al. (US 2003/0084162 A1). The Applicants have amended the claims to better distinguish the claimed invention from Johnson. The Examiner's consideration of the amended claims is respectfully requested.

In the Applicants' previous response, it was argued that the present invention and Johnson solve different problems with different solutions. In both, there is a configuration request from an inside realm (i.e., private domain) node, but in the Applicants' invention the process establishes a session with an outside realm (i.e., public domain) party, whereas in Johnson, the process establishes a pre-session state where a public domain node, at a later occasion, can establish a session. Thus, the Applicants' claimed invention establishes a session from the inside to the outside (private to public) while Johnson is working in the opposite direction (public to private).

The Examiner contends this argument is not persuasive because it depends on your perspective as to which is inside and which is outside. The Applicants have amended the claims to clarify that the originally recited "inside realm" is a private domain, and the originally recited "outside realm" is a public domain. Basis for the amendments is found in the specification on page 1, lines 11-19. The Applicants respectfully submit that Johnson does not disclose or suggest the claimed method of enabling establishment of a connection between a node of a private domain and a node of a public domain through an intermediate communication gateway.

Regarding claim 1, it is noted that a private-domain node sends a request to a communication gateway coupled to the private domain. Here, the private-domain node has taken the initiative for creation of a connection between the private-domain node and a public-domain node. The communication gateway allocates a private-domain node port number and a public-domain gateway address from a pool of gateway addresses. Novelty lies here in the central allocation of the private-domain node port number by the gateway. By centrally allocating the port number, the Applicants' claimed invention avoids collisions in the use of port numbers since the gateway is able to allocate a port number that is not in use by any other node. Therefore, blocking due to collisions in the use of port numbers is avoided. The public-domain gateway address and the private-domain node port number (which is allocated by the gateway) are then transmitted to the private-domain node.

The Examiner further argues that the claims recite that the gateway "allocates" an inside realm port, but it does not recite that it "selects" one. This is an unusual argument since those of ordinary skill in the telecommunications art would understand that allocating something such as a port includes not only selecting the port, but also reserving or connecting the port. Thus, the Examiner's argument does not seem to be viable in this regard.

The Applicants respectfully submit that by clarifying that the inside and outside realms are private and public domains, respectively, the claimed invention is clearly distinguished from Johnson. Therefore, the withdrawal of the § 102 rejection and the allowance of claims 1-3, 7-11, 15, 16-17, 19-20, and 23 are respectfully requested.

### **3.) Claim Rejections – 35 U.S.C. § 103(a)**

The Examiner rejected claims 4-6, 12, 13, 14, and 24 under 35 U.S.C. § 103(a) as being unpatentable over Johnson in view of Alkhatib (US 2002/0184390 A1). The Applicants respectfully submit that the amendments discussed above also distinguish the claimed invention from Johnson and Alkhatib. The Examiner's consideration of the amended claims is respectfully requested.

The Examiner cites Alkhatib for disclosing specific details recited in claims 4-6, 12, 13, 14, and 24. However, Alkhatib does not overcome the shortcomings of Johnson

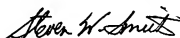
regarding the claimed communication gateway's central allocation of a private domain node port number and a public domain gateway address from a pool of gateway addresses. Therefore, the withdrawal of the § 103 rejection and the allowance of claims 4-6, 12, 13, 14, and 24 are respectfully requested.

#### 4.) Conclusion

In view of the foregoing remarks, the Applicants believe all of the claims currently pending in the Application to be in condition for allowance. The Applicants, therefore, respectfully request that the Examiner withdraw all rejections and issue a Notice of Allowance for claims 1-24.

The Applicants request a telephonic interview if the Examiner has any questions or requires any additional information that would expedite the prosecution of the Application.

Respectfully submitted,



Steven W. Smith  
Registration No. 36,684

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Ericsson Inc.  
6300 Legacy Drive, M/S EVR 1-C-11  
Plano, Texas 75024

(972) 583-1572  
steve.xl.smith@ericsson.com